

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA	CASE NO. 1:02 CR 0236
Plaintiff	JUDGE JOHN ADAMS
v.	MOTION TO JOIN DEFENDANT MICHEL ABOUD'S MOTION FOR BAIL PENDING DESIGNATION OF INSTITUTION AND FOR THE RIGHT OF SELF-SURRENDER
ELIE ABOUD, et al.	
Defendants	

Now comes Defendant Elie Abboud, by and through undersigned counsel, and for the same reasons articulated in Defendant Michel Abboud's Motion for Bail Pending Designation of Institution and for the Right of Self-Surrender (Docket 356), request the same relief. Elie Abboud has demonstrated repeatedly that he is not a flight risk, and requests an opportunity for a final visit with his mother.

Respectfully submitted,

**AMER CUNNINGHAM CO., L.P.A.**

/s/ Tom Houlihan  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served electronically upon all parties participating in the Court's electronic filing system, this 17 day of October, 2006.

/s/ Tom Houlihan  
*Attorney for Defendant Elie Abboud*